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Attorney for Defendant
Cody. Cramer

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

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|---------------------------|---|
| UNITED STATES OF AMERICA, |) Case No. 2:21-cr-00155-JAM |
| Plaintiff, |) |
| vs. |) STIPULATION AND ORDER TO CONTINUE |
| |) STATUS CONFERENCE AND EXCLUDE TIME |
| JOSHUA WILSON and |) Date: September 17, 2024 |
| CODY CRAMER, |) Time: 9:00 a.m. |
| Defendants. |) Judge: Hon. John A. Mendez |

IT IS HEREBY STIPULATED and agreed by and between United States Attorney Phillip A. Talbert, through Assistant United States Attorney James R. Conolly, counsel for Plaintiff; Federal Defender Heather Williams, through Assistant Federal Defender Hootan Baigmohammadi, counsel for Defendant Joshua Wilson; and Kyle Knapp, counsel for Cody Cramer that the status hearing currently set for September 17, 2024, at 9:00 be continued to **November 05, 2024, at 9:00 a.m.**

The parties specifically stipulate as follows:

1. By previous order, this matter was set for a status on September 17, 2024, at 9:00 a.m.
2. By stipulation, Mr. Cramer now moves to continue the status conference to November 5, 2024, at 9:00 a.m.

3. To date, the government has produced approximately 850 pages and various audio/video recordings of discovery to the defendants.
4. Mr. Wilson and Mr. Cramer require additional time to review the discovery, investigate and research possible defenses, research potential pretrial motions, and explore potential resolutions to the case, and otherwise prepare for trial.
5. Counsel for Mr. Wilson just completed a trial that consumed a great deal of preparation time and Mr. Cramer recently had had tests done following neck surgery that indicate other serious medical issues.
6. Mr. Wilson and Mr. Cramer believe that failure to grant the requested continuance would deny them the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.
7. Neither the government nor Mr. Wilson object to the continuance.
8. For the purpose of computing time under 18 U.S.C. § 3161 *et seq.* (Speedy Trial Act), the parties request that the time period between September 17, 2024 and November 5, 2024, inclusive, be deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv) (Local Code T4), because it would result from a continuance granted by the Court at the defense's request, based on a finding that the ends of justice served by granting the continuance outweighs the best interest of the public, Mr. Wilson, and Mr. Cramer in a speedy trial.

Respectfully submitted,

HEATHER E. WILLIAMS
Federal Defender

Date: September 10, 2024

/s/ Hootan Baigmohammadi
HOOTAN BAIGMOHAMMADI
Assistant Federal Defender
Attorneys for Mr. Wilson

Date: September 10, 2024

/s/ Kyle Knapp
Kyle Knapp
Attorney for Mr. Cramer

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1 Date: September 10, 2024

PHILLIP A. TALBERT
United States Attorney

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3 /s/ James R. Conolly
James R. Conolly
4 Assistant United States Attorney
Attorneys for Plaintiff

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6 **ORDER**

7 The Court, having received and considered the parties' stipulation, and good cause
8 appearing therefrom, **ADOPTS** the parties' stipulation in its entirety as its order.

9 IT IS SO ORDERED.

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11 Dated: September 13, 2024

/s/ John A. Mendez
THE HONORABLE JOHN A. MENDEZ
12 SENIOR UNITED STATES DISTRICT JUDGE
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